IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF A	MERICA)	Criminal No.	1:16-CR-	33(7 (MAD)
v.)	Indictment		
ROBERT J. SEIFERT,	DBERT J. SEIFERT,) Violations: 18 U.S.C. § 115(a) [Threat to Assault U.S. Officials]; 18 § 875(c) [Interstat Injure Another Per		ssault and Kill ls]; 18 U.S.C. terstate Threat to	
		3 Counts		
. Defendant	•	Counties of Offense:	Albai	Ny Montgomery U.S. DISTRICE COURT - N.D. OF N.Y. FILED
	THE GRAND	JURY CHARG	ES:	'JUL 2 8 2016
	CO [Threat to Assault	OUNT 1 and Kill U.S. O	fficials]	AT O'CLOCK Lawrence K. Bacaman, Clerk Albany

1. On June 15, 2016, in Albany and Montgomery Counties in the Northern District of New York, and elsewhere, the defendant, ROBERT J. SEIFERT, did knowingly threaten to assault and murder one or more United States officials, federal law enforcement officers, and officials whose killing would be a crime under Title 18, United States Code, Section 1114, with the intent to impede, intimidate, and interfere with such officials and law enforcement officers while engaged in the performance of official duties, and with the intent to retaliate against such officials and law enforcement officers on account of the performance of official duties, in that ROBERT J. SEIFERT spoke by phone to a U.S. Department of Veterans Affairs Police Officer at the Albany Stratton VA Medical Center, and told the Police Officer that he would kill the Police Officer and many other people at the Albany Stratton VA Medical Center, in violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).

COUNT 2 [Threat to Assault and Kill U.S. Officials]

On June 15, 2016, in Albany and Montgomery Counties in the Northern District of New York, and elsewhere, the defendant, ROBERT J. SEIFERT, did knowingly threaten to assault and murder one or more United States officials, federal law enforcement officers, and officials whose killing would be a crime under Title 18, United States Code, Section 1114, with the intent to impede, intimidate, and interfere with such officials and law enforcement officers while engaged in the performance of official duties, and with the intent to retaliate against such officials and law enforcement officers on account of the performance of official duties, in that ROBERT J. SEIFERT spoke by phone to a crisis hotline operator in Oregon, and told her that he wanted to "kill everybody at the Albany VA," that he would go to the Albany Stratton VA Medical Center "with my Uzi and ... start shooting people up," and that he would "kill everybody there," in violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).

COUNT 3 [Interstate Threat to Injure Another Person]

3. On June 15, 2016, in Albany and Montgomery Counties in the Northern District of New York, and elsewhere, the defendant, **ROBERT J. SEIFERT**, did knowingly transmit in interstate commerce a communication containing a threat to injure the person of another, knowing that the communication would be perceived as a threat, and for the purpose of issuing a threat, in that **ROBERT J. SEIFERT** spoke by phone to a crisis hotline operator in Oregon, and told her that he wanted to "kill everybody at the Albany VA," that he would go to the Albany Stratton VA Medical Center "with my Uzi and ... start shooting people up," and that he would "kill everybody there," in violation of Title 18, United States Code, Section 875(c).

Dated: July 28, 2016

A TRUE BILL, ***REDACTED***

Grand Jury Foreperson

RICHARD S. HARTUNIAN

United States Attorney

By:

Michael Barnett

Assistant United States Attorney

Bar Roll No. 519140